

NATURAL RESOURCES COMMISSION
STEPHEN J. ANDERSON
MARLENE J. FLUHRARY
GORDON E. GUYER
PERRY HAMMER
G. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

Gordon E. Guyer, Director

SOUTHEAST MICHIGAN FIELD OFFICE
ENVIRONMENTAL RESPONSE DIVISION

505 W. Main Street
Northville, Michigan 48167

October 8, 1987

Mr. P. R. Gilezan, Director
Plant Engineering and Environmental Planning
Chrysler Motors Corporation
12000 Chrysler Drive
Highland Park, Michigan 48288-1919

Subject: Chrysler (Acustar) Trenton Chemical Plant Environmental
Cleanup

Dear Mr. Gilezan:

I have reviewed the July 22, 1987 "Final Field Investigation Report and Site Remediation Activities Work Plan" prepared for Chrysler by Hart Engineers, Inc. Though general, the work plan represents a logical sequence of activities to address remediation from past waste burial. Specific comments I have relative to the work planned are as follows:

1. The responsibility for site cleanup rests entirely with Chrysler Motors Corporation and should proceed in the technical manner developed and agreed on by Chrysler and your consultants. DNR's role is solely that of regulating these activities in accordance with appropriate State statute, and at no time should our review or comments be viewed as a statement that further work, beyond that outlined, will not be required.
2. Our Waste Management Division district staff briefed me on the new 40 CFR Part 268 regulations concerning organic solvent contamination (land disposal ban), "California 11st" waste disposal requirements, etc. Thus, the statement on page 39 that "soils with organic solvent contamination greater than 1% will require . . . treatment prior to disposal", as I now understand, would apply only to those (spent solvent) wastes deemed F001-F005. In any case, Chrysler needs to dispose of the wastes with Part 268 regulations in mind.

US EPA RECORDS CENTER REGION 5




409539

3. On page 47, regarding drum sampling, it is stated that the required analysis will include the parameters of the EPA Priority Pollutant List plus typical RCRA waste characterization parameters. Neither the DNR nor EPA as our Waste Management Division informs me, has a requirement for full priority pollutant analysis on wastes to be disposed. Again, Part 268 regulations should dictate the appropriate sampling methodology.
4. Stabilization of free sludges and other viscous materials encountered during site cleanup may need a Michigan Act 64 (Hazardous Waste Management Statute) permit if these wastes are determined to be hazardous. A detailed proposal should be routed (through me) to our Waste Management Permit Section.
5. This site has the potential for being included on EPA's National Priority List (Superfund sites), thus, prompt remediation is warranted.
6. After a contractor is selected, I would like a schedule, when developed, of significant contractor activities so I can be present to observe key remediation work.

Finally, I think it would be worthwhile for me to review the detailed technical specifications in the cleanup bid packages. We appreciate Chrysler's candid and cooperative attitude on this project and hope to provide the necessary regulatory input to see this cleanup through to completion. I apologize for our geologist not having the time to comment on your hydrogeological work plan, but I will forward her remarks when obtained. If I can be of any assistance in the meantime, please advise.

Sincerely,


Michael A. Czuprowski, P.E.
(313) 344-9440

MAC:js

cc: T. Work, Env. Response Div. Region III Supervisor
J. Truchan, ERD Compliance & Enforcement Supervisor
A. Hogarth, ERD Remedial Action Supervisor
H. Shakir, ERD Detroit District Supervisor
B. Okwumabua, Waste Mgt. Div. Detroit District Supervisor
R. Schrameck, Surface Water Quality Div. Detroit Dist. Supervisor
G. Brown, Wayne Co. Health Dept.